

REMARKS

The Office Action mailed October 2, 2007 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 1-30 are now pending in this application. Claims 1-30 stand rejected.

The rejection of Claims 1-30 under 35 U.S.C. § 112, second paragraph, as being indefinite is respectfully traversed. More specifically, Claim 1 has been amended under 35 U.S.C. § 112, second paragraph, as being “incomplete for omitting essential elements, such omission amounting to a gap between the elements.”

Claim 1 has been amended to recite “an ACM central processing unit (CPU) configured to send ACM data to said web server and database module to embed ACM data in the file to facilitate transferring the ACM data to the at least one network module in response to the request”. Accordingly, Applicants submit that Claim 1 and dependent Claims 2-10 and 19 satisfy the requirements of Section 112, second paragraph. Independent Claims 11, 20, and 25 have been rejected under the same basis.

Claim 11 has been amended to recite “an ACM central processing unit (CPU) ... to facilitate transferring ACM data to the at least one network module in response to the request”. Accordingly, Applicants submit that Claim 11 and dependent Claims 12-18 satisfy the requirements of Section 112, second paragraph.

Claim 20 has been amended to recite “transmitting ACM data to be embedded in the file from an ACM central processing unit (CPU) to facilitate transferring the ACM data to the at least one network module in response to the request, wherein the ACM CPU is coupled directly to the web server and database module”. Accordingly, Applicants submit that Claim 20 and dependent Claims 21-24 satisfy the requirements of Section 112, second paragraph.

Claim 25 has been amended to recite “transferring the message from the first network module via an automation control module (ACM) backplane to the web server module to

facilitate transferring the message to the first network module in response to a request, wherein the message is transferred from an ACM central processing unit (CPU) that is coupled directly to the web server module”. Accordingly, Applicants submit that Claim 25 and dependent Claims 26-30 satisfy the requirements of Section 112, second paragraph.

For at least the reasons set forth above, Applicants respectfully request that the Section 112 rejection of Claims 1-30 be withdrawn.

The rejection of Claims 1-30 under 35 U.S.C. § 112, second paragraph, as being incomplete for omitting essential structural cooperative relationships of elements is respectfully traversed. More specifically, the Examiner alleges that “there are no structural cooperative relationships of elements between the ‘at least one network module’ and the ‘web server and database module’ or the ‘ACM central processing unit’”.

Claim 1 has been amended to recite “an ACM central processing unit (CPU) configured to send ACM data to said web server and database module to embed ACM data in the file to facilitate transferring the ACM data to the at least one network module in response to the request”. Accordingly, Applicants submit that Claim 1 and dependent Claims 2-10 and 19 satisfy the requirements of Section 112, second paragraph.

Claim 11 has been amended to recite “an ACM central processing unit (CPU) ... to facilitate transferring ACM data to the at least one network module in response to the request”. Accordingly, Applicants submit that Claim 11 and dependent Claims 12-18 satisfy the requirements of Section 112, second paragraph.

Claim 20 has been amended to recite “transmitting ACM data to be embedded in the file from an ACM central processing unit (CPU) to facilitate transferring the ACM data to the at least one network module in response to the request, wherein the ACM CPU is coupled directly to the web server and database module”. Accordingly, Applicants submit that Claim 20 and dependent Claims 21-24 satisfy the requirements of Section 112, second paragraph.

Claim 25 has been amended to recite “transferring the message from the first network module via an automation control module (ACM) backplane to the web server module to facilitate transferring the message to the first network module in response to a request, wherein the message is transferred from an ACM central processing unit (CPU) that is coupled directly to the web server module”. Accordingly, Applicants submit that Claim 25 and dependent Claims 26-30 satisfy the requirements of Section 112, second paragraph.

The rejection of Claims 1-30 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 6,578,147 to Klindt (hereinafter referred to as “Klindt”) is respectfully traversed.

Klindt describes an apparatus for accessing, controlling and monitoring a programmable logic controller with a network client having a conventional web browser. The apparatus includes an archive, an interface, and a library. The archive compiles an application written in code supported by the web browser. The interface responds to the application for establishing a connection between the controller and the network client. Further, the library responds to the application for supporting communication between the controller and the network client upon establishing a connection therebetween. Notably, Klindt does not describe an ACM CPU that is coupled directly to a web server and database module. Rather, in contrast to the present invention, Klindt describes a PLC CPU module that is coupled to a web server through a backplane. Accordingly, the system described by Klindt is susceptible to errors and delays due to the added complexity of the system.

Claim 1 recites a web-enabled automation control module (ACM) system including “at least one network module configured to receive a request for a file from a network; a web server and database module located outside said network module and including a database configured to store the file; and an ACM central processing unit (CPU) configured to send ACM data to said web server and database module to embed ACM data in the file to facilitate transferring ACM data to the at least one network module in response to the request, said ACM CPU coupled directly to said web server and database module.”

Klindt does not describe or suggest an ACM system as recited in Claim 1. More specifically, Klindt does not describe or suggest an ACM system including an ACM CPU that is coupled directly to a web server and database module. Rather, Klindt describes a PLC CPU module that is coupled to a web server through a backplane.

Accordingly Claim 1 is submitted to be patentable over Klindt.

Claims 2-10 and 19 depend from Claim 1. When the recitations of Claims 2-10 and 19 are considered in combination with the recitations of Claim 1, Applicants submit that Claims 2-10 and 19 likewise are patentable over Klindt.

Claim 11 recites a method for managing and controlling an automation control module (ACM) system including “sending a request for a file from a network to at least one network module; storing the file in a database of a web server and database module; and sending ACM data from an ACM central processing unit (CPU) to the web server and database module to embed the ACM data in the file to facilitate transferring the ACM data to the at least one network module in response to the request, wherein the ACM CPU is coupled directly to the web server and database module.”

Klindt does not describe or suggest a method for managing and controlling an ACM system as recited in Claim 11. More specifically, Klindt does not describe or suggest a method, wherein ACM data is sent from an ACM CPU that is coupled directly to a web server and database module. Rather, Klindt describes a PLC CPU module that is coupled to a web server through a backplane.

Accordingly Claim 11 is submitted to be patentable over Klindt.

Claims 12-18 depend from Claim 11. When the recitations of Claims 12-18 are considered in combination with the recitations of Claim 11, Applicants submit that Claims 12-18 likewise are patentable over Klindt.

Claim 20 recites a method for managing and controlling an automation control module (ACM) system, the system including at least one network module electrically

connected to a network and a web server and database module electrically connected to the network module and located outside the network module, wherein the method includes “receiving a request for a file from the network; storing the file in a database of the web server and database module; and transmitting ACM data to be embedded in the file from an ACM central processing unit (CPU) to facilitate transferring the ACM data to the at least one network module in response to the request, wherein the ACM CPU is coupled directly to the web server and database module.”

Klindt does not describe or suggest a method for managing and controlling an ACM system, as is recited in Claim 20. More specifically, Klindt does not describe or suggest a method, wherein ACM data is transmitted from an ACM CPU that is coupled directly to a web server and database module. Rather, Klindt describes a PLC CPU module that is coupled to a web server through a backplane.

Accordingly Claim 20 is submitted to be patentable over Klindt.

Claims 21-24 depend from Claim 20. When the recitations of Claims 21-24 are considered in combination with the recitations of Claim 20, Applicants submit that Claims 21-24 likewise are patentable over Klindt.

Claim 25 recites a method for managing and controlling network traffic comprising utilizing at least one network module and a web server module located outside the at least one network module, wherein the method includes “receiving, by a first network module of the at least one network module, a message via a network; and transferring the message from the first network module via an automation control module (ACM) backplane to the web server module to facilitate transferring the message to the first network module in response to a request, wherein the message is transferred from an ACM central processing unit (CPU) that is coupled directly to the web server module.”

Klindt does not describe or suggest a method for managing and controlling network traffic, as is recited in Claim 25. More specifically, Klindt does not describe or suggest a method, wherein a message is transferred from an ACM central processing unit (CPU) that is

coupled directly to a web server module. Rather, Klindt describes a PLC CPU module that is coupled to a web server through a backplane.

Accordingly Claim 25 is submitted to be patentable over Klindt.

Claims 26-30 depend from Claim 25. When the recitations of Claims 26-30 are considered in combination with the recitations of Claim 25, Applicants submit that Claims 26-30 likewise are patentable over Klindt.

In view of the foregoing amendment and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully submitted,



Eric T. Krischke
Registration No. 42,769
ARMSTRONG TEASDALE LLP
One Metropolitan Square, Suite 2600
St. Louis, Missouri 63102-2740
(314) 621-5070